Ian S. Landsberg, Esq. (SBN 137431) <u>ilandsberg@sklarkirsh.com</u> **SKLAR KIRSH, LLP** 

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Attorneys for Hocking International Laboratories

## UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

	)
In re:	) Case No.: 21-07923
SUZLON WIND ENERGY CORP.,	) Chapter 7
Debtor.	)
	)
	) )

REQUEST FOR SPECIAL NOTICE, SERVICE OF PAPERS AND RESERVATION OF RIGHTS

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## TO THE CLERK OF THE COURT AND TO ALL INTERESTED PARTIES:

PLEASE TAKE NOTICE that pursuant to Rules 2002, 3017, 4001, 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure, Hocking International Laboratories, landlord for the premises located at 1510 17<sup>th</sup> Street SW, Building E, approximately 3 acres of storage yard space, and approximately 5,000 square feet of Building B in Pipestone, Minnesota request that notice of all matters in the above-captioned case which require notice to creditors, or to other parties in interest including, without limitation, all notices and papers referred to in Federal Rules of Bankruptcy Procedure 2002, 4001 and 9007, and additionally including, without limitation, copies of any orders, applications, and notices thereof, complaints, demands, hearings, motions, petitions, pleadings or requests (whether for relief from stay, adequate protection, or any other documents relating to adversary proceedings or otherwise), any other documents brought before the Court in these cases, whether formal or informal, and notices thereof, complaints, demands, hearings, motions, petitions, pleadings or requests (whether for relief from stay, adequate protection, or any other documents relating to adversary proceedings or otherwise), any other documents brought before the Court in these cases, whether formal or informal, and other matters, whether written or oral, and whether transmitted or conveyed by mail, delivery, facsimile, telephone or otherwise, be sent to counsel for Hocking International Laboratories, as follows:

> Ian S. Landsberg, Esq. Sklar Kirsh, LLP 1880 Century Park East, Suite 300 Los Angeles, CA 90067

Telephone: (310) 845-6416 Facsimile: (310) 929-4469

Email: ilandsberg@sklarkirsh.com

Request is made that the Clerk of the Court and all parties in interest to which this Request for Special Notice is being mailed, place the foregoing name and address on any mailing matrix or list of creditors to be prepared or existing in this proceeding. Neither this

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Request for Notice nor any subsequent appearance, pleading, claim, proof of claim,

document, suit, motion nor any other writing or conduct, shall constitute a waiver of

Hocking International Laboratories:

(a) Right to have any and all final orders in any and all non-core matters

entered only after de novo review by a United States District Court;

(b) Right to a trial by jury in any case, controversy or proceeding as to

any and all matters so triable, notwithstanding the designation vel non of such matters as

"core proceedings" pursuant to 28 U.S.C. § 157(b)(2), and regardless of whether such jury

trial is pursuant to statute or the United States Constitution;

(c) Right to have the reference withdrawn by the United States District

Court in any manner or Proceeding subject to mandatory or discretionary withdrawal; and

(d) Other rights, claims, actions, defenses, setoffs, recoupments or other

matters to which Hocking International Laboratories is entitled under any agreements or at

law or in equity or under the United States Constitution.

All of the above rights are expressly reserved by Hocking International

Laboratories, without exception, and without conceding jurisdiction in any way by this

filing or by any other participation in this bankruptcy case.

Dated: July 26, 2021

SKLAR KIRSH, LLP

By:

Ian S. Landsberg

Attorneys for Hocking International

Laboratories